

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Criminal Action No. 07-41-JJF
	:	
TIMOTHY WATSON,	:	
	:	
Defendant.	:	

**DEFENDANT'S UNOPPOSED MOTION TO POSTPONE**  
**THE CHANGE OF PLEA HEARING**

Defendant, Timothy Watson, by and through his attorney, Edson A. Bostic, Federal Public Defender for the District of Delaware, files the instant Unopposed Motion to Postpone the Change of Plea Hearing in the above matter.

In support thereof, it is averred as follows:

1. On or about March 29, 2007, Defendant was charged in an one-count Indictment with felon in possession of a weapon, in violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2). Counsel was appointed to represent Defendant at or about that time.

2. This Court held a pretrial conference on July 17, 2007, at which time Counsel informed that he expected the defendant will enter a guilty plea to the Indictment.

3. Accordingly, this Court stated that it could schedule the Change of Plea Hearing for the end of July, 2007. However, Counsel informed the Court that he was unavailable then and requested that the Court postpone the date of the hearing until on or about September 7, 2007. Due to other commitments and a heavy schedule, Counsel will be unavailable until that time.

4. Counsel discussed the matter with counsel for the government, Martin Meltzer, Esquire, and the government does not oppose the instant motion.

**WHEREFORE**, it is respectfully requested that this Court enter an Order granting Defendant's Motion to Postpone Change of Plea Hearing, and postponing the hearing until or after September 7, 2007, or to a time convenient for the Court and all counsel.

Respectfully submitted,

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Attorney for Timothy Watson

Dated: July 19, 2007